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13
14 **UNITED STATES DISTRICT COURT**
15
16 **DISTRICT OF NEVADA**

17 SONIA ESPARZA, individually and as
18 Special Administrator of the Estate of
19 FERNANDO MARTINEZ JR.,

20 Plaintiffs,

21 vs.

22 WELLPATH, LLC; LAS VEGAS
23 METROPOLITAN POLICE
24 DEPARTMENT; SHERIFF KEVIN
25 MCMAHILL; DEPUTY CHIEF FRED
HAAS; DOES 1-20,

Defendants,

FERNANDO MARTINEZ SANTOS

Nominal Defendant.

Case Number: 2:23-cv-02161-JCM-VCF

26 **STIPULATION AND ORDER TO**
EXTEND DEFENDANT LAS VEGAS
METROPOLITAN POLICE
DEPARTMENT'S REPLY IN SUPPORT
OF MOTION TO DISMISS
PLAINTIFFS' FIRST AMENDED
COMPLAINT

(FIRST REQUEST)

27 Plaintiffs, Sonia Esparza, individually, and as Special Administrator for the Estate of
28 Fernando Martinez, Jr. ("Plaintiffs"), by and through their counsel of record, Peter Goldstein
Esq., of Peter Goldstein Law Corp. and Defendant, the Las Vegas Metropolitan Police
Department (the "Department" or "LVMPD"), by and through their counsel of record, Craig
R. Anderson, Esq. and Kaden P. Killpack, Esq., of Marquis Aurbach, hereby agree and
jointly stipulate the following:

1. LVMPD filed its Motion for to Dismiss Plaintiffs' First Amended Complaint
on April 25, 2024 [ECF No. 17];

1 2. Plaintiffs' Opposition to LVMPD's Motion to Dismiss Plaintiffs' First
2 Amended Complaint was filed on May 9, 2024 [ECF No. 22];

3 3. LVMPD is unable to meet the deadline of May 16, 2024 currently scheduled
4 for LVMPD's Reply in Support of Motion to Dismiss Plaintiffs' First Amended Complaint;

5 4. The Parties have agreed to a two-week extension for LVMPD's Reply in
6 Support of Motion to Dismiss Plaintiffs' First Amended Complaint;

7 5. Accordingly, the deadline for LVMPD's Reply in Support of Motion to
8 Dismiss Plaintiffs' First Amended Complaint, currently due on May 16, 2024, be extended
9 to and including Thursday, May 30, 2024;

10 6. This is the Parties' first request to extend the deadline to LVMPD's Reply in
11 Support of Motion to Dismiss Plaintiffs' First Amended Complaint; and

12 7. This Stipulation is being entered in good faith and not for purposes of delay.

13 IT IS SO STIPULATED.

14 Dated this 15th day of May, 2024

15 Dated this 15th day of May, 2024

16 PETER GOLDSTEIN LAW CORP

17 MARQUIS AURBACH

18 By: /s/ Peter Goldstein

19 Peter Goldstein, Esq.
20 Nevada Bar No. 6992
21 10161 Park Run Drive, Suite 150
22 Las Vegas, Nevada 89145
23 Attorneys for Plaintiffs
24 Sonia Esparza, individually, and as
25 Special Administrator for the Estate
26 of Fernando Martinez, Jr.

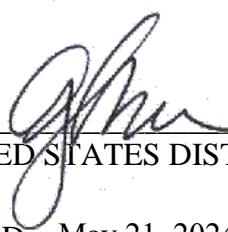
27 By: /s/ Kaden P. Killpack

28 Craig R. Anderson, Esq.
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30 Kaden P. Killpack, Esq.
31 Nevada Bar no. 16560
32 10001 Park Run Drive
33 Las Vegas, Nevada 89145
34 Attorneys for Defendant LVMPD

22 **ORDER**

23 The above Stipulation is hereby GRANTED.

24 IT IS SO ORDERED:

25 
26 UNITED STATES DISTRICT COURT JUDGE

27 DATED: May 21, 2024